Q. Does IAVA believe that the Employer Support for the Guard and Reserve (ESGR) award support system for companies is effective? If not, how could the system be improved?

IAVA believes that recognizing employers who support the Guard and reserve service of their employees is important. Recognizing employer support not only serves to applaud the valuable contributions of employers but lets employees and the general public know a company's level of commitment. The Employer Support of the Guard and Reserve has several different awards that an employer can receive. An employer must be nominated by a current employee who is a member of the Guard or reserve for a Patriot Award; higher awards are then considered by state or territory ESGR committees.

The awards system, as currently designed, can serve to recognize employer support ranging from being "highly supportive" of employees' service to continuing employees' salaries while they are on active duty. However, it is not clear from the nominating forms or the process described on the ESGR website what other (if any) specific criteria is used to evaluate employers. IAVA believes that outlining specific criteria for specific awards would help increase the efficacy of the program by giving employers goals to strive for and letting the public know exactly what an employer has done to deserve a Freedom Award, for instance This approach would also guarantee that employers meet a minimum standard. For example, all levels of awards should require that an employer not have any USERRA complaints, SCRA violations, or legal action related to an employee's military service filed against them.

The Department of Labor's Office of Contract Compliance Programs (OFCCP) has published a proposed rule which would require for the first time that federal contracts establish annual hiring benchmarks, including specific information on veterans in the civilian labor force, the number of veterans who participated in state employment services, and referral ratios.

## Q. Does IAVA have any concerns about the proposed rule?

In the current economic climate, the veteran unemployment rate has been consistently higher than the civilian unemployment rate. In some cases, the unemployment rate for veterans of Iraq and Afghanistan has been significantly higher, such as the unemployment rate for 18-24 year olds which for veterans has been double the civilian rate and higher. Therefore, it is sensible that the federal government does everything in its power to reduce the level of unemployment for those who have served their country so honorably.

One of the hurdles that makes assessing the success of programs aimed at veterans is the lack of information about veterans. While IAVA supports establishing benchmarks for hiring of veterans by federal contractors and establishing benchmarks for contracting with service-disabled veteran small businesses (SDVOSB) and veteran owned small businesses (VOSB), we recognize that this poses some issues for employers as well as the federal government. Establishing benchmarks

arbitrarily is a concern because some fields may be significantly under-represented by veterans, SDVOSB and VOSB. The reporting requirements required by the OFCCP's proposed rule do not appear to be overly burdensome and can possibly fill some of the gaps in knowledge about veteran employment. Benchmarks should also be adjusted based on the best available information.

IAVA believes that requiring federal contractors to post employment vacancies with state employment agencies is a reasonable request. Theoretically at least, disabled veteran outreach program officers (DVOPs) and local veteran employment representatives (LVERs) are the first point of contact for veterans seeking employment. Practically, this has not been the case, however, because states have come to use DVOPs and LVERs as auxiliary personnel for all clients rather than allowing them to focus exclusively on veterans. This is an example of why IAVA supports moving the Department of Labor's Veteran Employment and Training Service (DoL VETS) to the VA. Consolidating DVOPs and LVERs into a single role as veteran employment specialists and requiring that they focus on veterans will substantially increase the likelihood that OFCCP's posting requirements find their target audience and that the intent of increasing veteran employment levels with federal contractors is met.